IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Kapochunas et al.

Serial No.:   10/810,267

For: SYSTEM AND METHOD FOR DATA CLEANSING

Filed: March 26, 2004

Examiner: Pardo, Thuy N.

Art Unit: 2165

Confirmation No. : 8528

Customer No. :   27,623

Attorney Docket No.:   384.7817USU

**Mail Stop AF
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Alexandria, VA 22313-1450**

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Dear Sir:

Applicants request review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a Notice of Appeal. The review is requested for the reasons stated on the attached sheets. There are no other related appeals.

Reasons for Request for Review

Claims 1 through 21 are pending in the application. Claims 1 through 21 have been rejected.

The Office Action asserts that under 35 U.S.C. §102(e), claims 1 through 21 are anticipated by U.S. Patent Application Publication No. 2004/0153663 to Clark. *See* Final Office Action (mailed June 20, 2006) at page 2.

Applicants respectfully submit, however, that Clark fails to disclose or suggest the step of providing a single best address as disclosed in independent claim 1. *See* Response (dated August 21, 2006) at pages 6-7; Amendment (dated March 28, 2006). The method disclosed in Clark compares demographic data based on two addresses and produces a score indicating a relative risk of fraud. Clark discloses updating an address velocity file, not the address itself. The address velocity file disclosed in Clark stores information relating to inquiry activity concerning both the new address and the reference addresses. Rather than cleansing the data by providing a **single** best address, the method of Clark retains **multiple** addresses and appends additional information to those addresses. *See* Response (dated August 21, 2006) at page 7. Even allowing for the broadest reasonable interpretation of the language in claim 1, Clark does not disclose or suggest providing a single best address. Consequently, claim 1 is patentable over Clark.

In response to the above arguments, an Advisory Action (mailed September 8, 2006) was issued arguing that "Clark teaches the feature of producing a best updated address by comparing the current address with the 'change to' address based on weighting factors." As support for this assertion, the Advisory Action cites FIG. 9, claims 2 and 3, and paragraphs [0222]-[0224] of Clark.

The Office Action has failed to establish a prima facie case of anticipation regarding claim 1. A claim is anticipated only if each and every element as set forth

in the claim is found in a single prior art reference. Again, Clark does not disclose the step of providing a single best address. The portion of Clark cited by the Advisory Action indicates that information relating to both a new address and a reference address is stored and updated in an address velocity file. Information relating to the addresses is appended to the addresses in the address velocity file. Once information has been appended to the addresses, a score is created based on all the data, generally using statistical models. The score predicts the risk of fraud and is calculated based on weighted variables, such as change in financial make-up of the two addresses, home value between the two addresses, and distance between the two addresses. Clark discloses a method for assessing the relative risk of fraud based on divergence in demographic data between addresses; Clark fails to disclose or suggest comparing addresses and providing a single best address based on the comparison. Consequently, a prima facie case of anticipation has not been established in regard to claim 1.

Claims 2 through 11 depend from independent claim 1 and are not anticpated by Clark for at least the reasons given above regarding claim 1.

Independent claims 12 and 20 include elements similar to those found in claim 1. Claims 12 and 20 are therefore not anticipated by Clark for at least the reasons given above regarding claim 1. Claims 13 through 19 depend from independent claim 12 and claim 21 depends from claim 20. Claims 13 through 19 and 21 are also patentable over Clark by virtue of their dependency on claims 12 or 20.

Applicants respectfully submit that the rejection of record is clearly erroneous based on the legal and factual deficiencies outlined above. Applicants respectfully request withdrawal of the rejection and that this application be passed to allowance.

Respectfully submitted,

Date: September 20, 2006
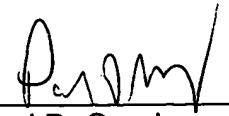
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